

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of)

Establishment of a Federal)
Advisory Committee To Assist The)
Common Carrier Bureau in the)
Implementation of an Electronic)
Filing System)

CC Docket No. 94-18

To: The Commission

COMMENTS OF THE
UTILITIES TELECOMMUNICATIONS COUNCIL

Pursuant to Section 1.415 of the Commission's Rules, the Utilities Telecommunications Council (UTC) hereby submits its comments with respect to a Public Notice issued by the Commission (FCC 94-44), released March 7, 1994, in the above captioned matter.

I. INTRODUCTION

UTC is the national representative on communications matters for the nation's electric, gas, water, and steam utilities, and interstate gas pipelines. In addition, UTC is the Federal Communications Commission's (FCC) certified frequency coordinator for the Power Radio Service, and since late 1992 has been electronically filing private land mobile applications in the Power Radio Service. Accordingly, UTC is pleased to have this opportunity to comment on the Commission's proposed formation of a Federal Advisory Committee to implement an electronic filing system.

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II. THE FCC SHOULD BROADEN THE SCOPE OF ITS PROPOSED ADVISORY COMMITTEE TO IMPLEMENT A COMMISSION-WIDE ELECTRONIC FILING SYSTEM

In the Public Notice the Commission indicates its intention to establish a Federal Advisory Committee to assist the Common Carrier Bureau in the development and implementation of an electronic filing system. UTC supports the establishment of such a Committee but urges the Commission to broaden the scope of its proposal to encompass the implementation of a Commission-wide electronic filing system.

The piecemeal approach of focusing purely on a single bureau would be an inefficient use of Commission and private resources that could ultimately lead to the adoption of incompatible systems and protocols. The Commission should not squander the valuable information and experience that other bureaus and user groups have already gained in electronic filing. For example, the FCC's Private Radio Bureau has been engaged in efforts to implement electronic filing for several years. In the case of UTC, these tests have progressed to the point where all Power Radio applications other than those accompanied by waiver requests are transmitted by UTC to the FCC electronically.

Moreover, to initially focus exclusively on the Common Carrier Bureau would ignore the pressing need for the implementation of electronic filing in other areas of the Commission. For example, the Private Radio Bureau has and will

continue to have the largest number of licensed applications to handle on a yearly basis, particularly now that the Licensing Division of the Private Radio Bureau has been given responsibility for common carrier microwave licensing as well as other "non-private" radio services.

It must also be recognized that recently there has been a convergence of regulations and licensing requirements among disparate radio services. For example, in the fixed point-to-point microwave radio context the FCC adopted regulations applying the same coordination and interference criteria for common carrier and private microwave licensees in the 4 GHz, 6 GHz, 10 GHz and 11 GHz bands.^{1/} Indeed, the Commission announced in that decision its intention to consolidate the rules for private and common carrier microwave.^{2/} In addition, UTC and others have recently called for the formation of a "Wireless Services Bureau" that would further consolidate existing bureaus and divisions within the Commission in order to more efficiently implement these and other regulatory changes.^{3/} In light of these potential consolidations it would be appropriate to broaden the focus of a Federal Advisory Committee.

^{1/} Second Report and Order (Second R&O) in ET Docket No. 92-9, 8 FCC Rcd 6495 (1993).

^{2/} Second R&O in ET Docket No. 92-9, 8 FCC Rcd at 6520.

^{3/} UTC Comments in GN Docket No. 93-252, filed November 8, 1993.

Finally, a single effort to implement electronic data interchange (EDI), would allow for the development of uniform protocols and standards in a streamlined manner consistent with Vice President Gore's call to "reinvent government." UTC would be pleased to offer its experience in electronic filing to assist the Commission in such an effort. As noted above, UTC has successfully implemented an electronic filing process with the Licensing Division of the Private radio Bureau, and is currently one of only two frequency coordination groups which are authorized to file all new and modification applications, other than those accompanied by waiver requests, without "back-up" paper documentation. In addition, UTC has successfully implemented a procedure for the electronic exchange of frequency coordination data among several of the private radio frequency coordination groups with which UTC must engage in interservice coordination.

UTC's participation in electronic filing has had positive results, both for UTC as a frequency coordinator, and the applicants who submit applications through UTC. UTC is now transmitting electronically more than 80% of the applications it processes.^{4/} Because of the strict coding standards which must be employed to ensure consistency in the FCC's licensing data

^{4/} Applications accompanied by waiver requests, amendments to pending applications, and resubmitted applications are currently filed only in paper form.

base, there is a significant decrease in the possibility of application errors being entered into the data base. This improved accuracy results in better overall frequency coordination and higher customer satisfaction. Electronic filing also eliminates the normal delay associated with the delivery of paper applications to the Licensing Division in Gettysburg and eliminates the need for data entry by Commission staff, thereby significantly expediting the licensing process.

III. CONCLUSION

UTC supports the Commission's efforts to implement an electronic filing system, and urges the Commission to broaden the focus of its proposed Federal Advisory Committee to encompass a Commission-wide system. In this manner the FCC will be able to more efficiently utilize Commission resources and more effectively meet the needs of all Commission users. UTC would also welcome the opportunity to participate on any Advisory Committee on electronic filing.

WHEREFORE, THE PREMISES CONSIDERED, the Utilities
Telecommunications Council respectfully requests the Commission
to take action consistent with the views expressed herein.

Respectfully submitted,

UTILITIES TELECOMMUNICATIONS
COUNCIL

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